Bumble Bee Foods, LLC
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June 5, 2008

Via Email Only

The Honorable Bart Stupak,
Chairman,
Subcommittee on Oversight and Investigations,
Committee on Energy and Commerce,
Room 316
Ford House Office Building
Washington, DC 20515
Attention: David Nelson

Dear Mr. Stupak:

This letter shall serve as Bumble Bee Foods, LLC's supplemental response to your letter dated May 8, 2008 (the "May 8 Letter") with respect to your investigation of issues related to the safety of the Nation's food supply and specifically issues involving microbiological and/or chemical contamination. Bumble Bee Foods, LLC and its affiliates are collectively referred to herein as the "Company". Our initial response was provided to you on May 29, 2008 (the "May 29 Letter"). There is a small amount of remaining documentation that needs to be retrieved from offsite storage, and we intend to provide any remaining relevant information by June 13, 2008.

Please note that many of the documents included in our response contain proprietary information and thus are confidential; they have been stamped "Confidential"; and we respectfully request that they be treated as confidential.

In addition to facilities owned or operated by Bumble Bee, our responses include Blacks Harbour, New Brunswick, Canada, a sardine-processing facility owned by an affiliate of Bumble Bee to the extent that there is responsive information that relates to products imported into the United States. Our responses also include tuna loin processing facilities located in Fiji and Trinidad to the extent that there is responsive information that relates to products imported into the United States. These loining facilities are not owned by Bumble Bee, but Bumble Bee provides oversight with respect to, and approves, their quality assurance procedures and protocols. Also, Bumble Bee owns a facility in Violet, Louisiana that was destroyed in Hurricane Katrina in 2005. No records are available for this facility. We have not included products that are not for human consumption (e.g., fish meal). Finally, our response to Question #1 only includes recalls in the United States of products regulated by the FDA or USDA.

We received from Mr. David Nelson the following clarifications of the May 8 Letter: (i) the six requests in the letter are limited to products regulated by the Food and Drug Administration, and do not include products regulated by the U.S. Department of Agriculture; (ii) request 6 does not cover a situation where FDA or a state agency requested documents, the Company asked that the request be put in writing, the request was put in writing, and the Company complied with the request; (iii) although the May 8 Letter requests production of documents by May 22, 2008, it is acceptable if production begins on May 29, 2008 and is completed shortly thereafter; and (iv) the Committee would prefer that documents provided previously be provided again, and that documents be produced in an electronic format. Notwithstanding the foregoing, our responses include products regulated by the USDA.

1. ***A list of all food recalls and food safety alerts issued by your company. For each recall or safety alert, please provide the date of the recall or alert, the product and brand affected, and the reason for the recall or alert. If the food was affected by microbiological or chemical contamination, please identify the contaminant.***

In addition to the information provided in the May 29 Letter, in 2001, Connors Bros., Limited, a Canadian affiliate of Bumble Bee, withdrew Brunswick® brand steel-packed sardine product from the market due to corrosion on the easy open feature and the potential for loss of the hermetic seal. There was no evidence of contamination. The letter informing the FDA is attached hereto. See "Letter re Market Withdrawal" (CBF048901-048902). This withdrawal occurred prior to the merger of Connors Bros. and Bumble Bee Foods (i.e., Connors Bros., Limited was not a Bumble Bee affiliate in 2001).

2. ***For each brand or kind of product, please list all instances when internal microbiological testing was found to be positive for the presence of E. coli, Salmonella, Cyclospora cayetanensis, Cryptosporidium, hepatatitis A, Clostridium botulinum, or Listeria in excess of the highest limit acceptable to the Food and Drug Administration (FDA) or any State regulatory authority.***

Response provided in the May 29 Letter.

3. ***For each brand or kind of product, please list the instances when internal testing was found to be positive for the presence of a chemical contaminant at levels in excess of the highest limit acceptable to FDA or any State regulatory authority.***

RESPONSE: The Company's tuna canning facilities test finished product for histamine. The FDA has set 50 parts per million as the guidance action level for histamine. See attached document, "Canning Facilities Histamine Results—Cans" (CBF 048903) for a list of positive test results in excess of 50 parts per million. Some of the records for

Bumble Bee's factory in Santa Fe Springs, CA are located in third-party offsite storage. We will provide any additional relevant test results by June 13, 2008.

In addition, Bumble Bee's quality assurance ("QA") department periodically conducts sensory tests of samples of product from the canning factories. During one such "grading audit" in 2006, a QA employee identified histamine in a canned tuna product through the tasting. Following the tasting, this product was sent to the laboratory for histamine testing and the test result in excess of 50 parts per million is attached. See "QA Test Results" (CBF 048904). With the exception of nine cases, Bumble Bee was able to retrieve the entire production lot from its distribution centers. The nine cases were retrieved from a customer's warehouse. None of this product reached retail shelves.

4. ***For products imported into the United States for handling or processing by any facility operated by your firm, please list the instances when internal or outside laboratory testing was positive for the presence of either chemical or microbiological contaminant in excess of FDA or State regulatory limits.***

RESPONSE: The FDA's guidance of 50 parts per million for histamine also applies to products included in this response. The tuna loining facilities in Fiji and Trinidad test the round, or whole, tuna for histamine levels upon their receipt of the fish. See attached document, "Fiji & Barana Test Results" (CBF 048905-048907) for a list of positive test results in excess of 50 parts per million. The Trinidad plant began operations in 2002 and therefore has no records prior to such date.

In addition, the tuna canning facilities test the loins received from the loining plants for histamine. See attached document, "Canning Facilities Histamine Results-Loins" (CBF 048908-048911) for a list of positive test results in excess of 50 parts per million. Bumble Bee's factory in Santa Fe Springs, CA has reported results for the period 2005-2008. We have confirmed that records are available for 2002-2005 but they must be pulled from third-party offsite storage. We will provide any additional relevant test results by June 13, 2008. No records are available for Santa Fe Springs prior to 2002 as they were destroyed in connection with the factory's documentation retention policy.

In addition, with respect to anchovies, the Company tested and destroyed certain product located in a Florida warehouse utilized by the Company for histamine following a consumer complaint in December 2006. See attached document, "Anchovy Histamine Results" (CBF 048912-048918) for a list of positive test results in excess of 50 parts per million.

5. ***For each of the above items, please specify whether FDA was notified, and if not, why not.***

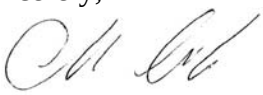
RESPONSE: See Response to Question #1. With respect to Questions #3 and #4 above, the FDA was not notified of the results with respect to tuna products. There is no

requirement to notify the FDA and, in every case, the round fish, tuna loin or finished product was rejected because of the elevated histamine levels or, in the case of the issue identified by QA after product left the factory, all product was retrieved prior to going to retail shelves.
With respect to the anchovy product discussed in the Response to Question #4 above, the Company did not provide the test results to FDA but FDA and the Company both learned of the issue through a consumer complaint. Both the Company and FDA determined that there was no food-safety issue.

6. ***Please supply list of all instance where FDA or any State regulatory authority was defined entrance to any facility, foreign or domestic, or denied access to any records regarding microbiological or chemical testing performed on products processed at the facility. This request encompasses denials or requests for entry or any such testing record regardless of whether the plant or its records were to be made available for inspection at a later date.***

Response provided in the May 29 Letter.

Sincerely,



Christopher Lischewski
President & CEO
Bumble Bee Foods, LLC